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Deutsche Bank Aktiengesellschaft,
John Cryan, Christian Sewing,
Marcus Schenck, and James Von Moltke

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ALI KARIMI, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

v.

DEUTSCHE BANK
AKTIENGESELLSCHAFT, JOHN CRYAN,
CHRISTIAN SEWING, MARCUS
SCHENCK, and JAMES VON MOLTKE,

Defendants.

Case No. 2:20-cv-08978

Hon. Esther Salas, U.S.D.J.

Hon. Michael A. Hammer, U.S.M.J.

**DECLARATION OF SHEILA C.
RAMESH IN SUPPORT OF
DEFENDANTS' MOTION TO
TRANSFER PURSUANT TO 28 U.S.C.
§ 1404(a), OR, IN THE
ALTERNATIVE, DISMISS
PLAINTIFFS' SECOND AMENDED
CLASS ACTION COMPLAINT**

I, SHEILA C. RAMESH, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am admitted *pro hac vice* to appear before this Court and am a member of the law firm Cahill Gordon & Reindel LLP, attorneys for Defendants Deutsche Bank Aktiengesellschaft (“Deutsche Bank”), John Cryan, Christian Sewing, Marcus Schenck, and James Von Moltke in the above-captioned action. I submit this declaration to place before the Court certain publicly available documents that are referenced in the accompanying Memorandum of Law in Support of Defendants’ Motion to transfer this action to the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 1404(a), or in the alternative, dismiss Plaintiffs’ Second Amended Class Action Complaint.

2. Annexed hereto as Exhibit 1 is a true and correct copy of the July 6, 2020 Consent Order among Deutsche Bank; Deutsche Bank AG, New York Branch; Deutsche Bank Trust Company Americas; and the New York State Department of Financial Services.

3. Attached hereto as Exhibit 2 is a true and correct copy of the relevant excerpts of Deutsche Bank’s 2017 Annual Report, dated March 16, 2018.

4. Attached hereto as Exhibit 3 is a true and correct copy of the relevant excerpts of Deutsche Bank’s 2017 Form 20-F, publicly filed on March 16, 2018.

5. Attached hereto as Exhibit 4 is a true and correct copy of the relevant excerpts of Deutsche Bank’s 2016 Form 20-F, publicly filed on March 20, 2017.

6. Attached hereto as Exhibit 5 is a true and correct copy of the relevant excerpts of Deutsche Bank’s 2016 Annual Report, dated March 20, 2017.

7. Attached hereto as Exhibit 6 is a true and correct copy of the relevant excerpts of Deutsche Bank’s 2018 Form 20-F, publicly filed on March 22, 2019.

8. Attached hereto as Exhibit 7 is a true and correct copy of the relevant excerpts of Deutsche Bank’s 2018 Annual Report, dated March 22, 2019.

9. Attached hereto as Exhibit 8 is a true and correct copy of the relevant excerpts of Deutsche Bank's 2019 Form 20-F, publicly filed on March 20, 2020.

10. Attached hereto as Exhibit 9 is a true and correct copy of the relevant excerpts of Deutsche Bank's 2017 Non-Financial Report, dated March 12, 2018.

11. Attached hereto as Exhibit 10 is a true and correct copy of the relevant excerpts of Deutsche Bank's 2017 Annual Financial Statements and Management Report, dated March 12, 2018.

12. Attached hereto as Exhibit 11 is a true and correct copy of the relevant excerpts of Deutsche Bank's 2018 Non-Financial Report, dated March 15, 2019.

13. Attached hereto as Exhibit 12 is a true and correct copy of the relevant excerpts of Deutsche Bank's 2018 Annual Financial Statements and Management Report, dated March 15, 2019.

14. Attached hereto as Exhibit 13 is a true and correct copy of the relevant excerpts of Deutsche Bank's 2019 Non-Financial Report, dated March 13, 2020.

15. Attached hereto as Exhibit 14 is a true and correct copy of the relevant excerpts of Deutsche Bank's 2015 Form 20-F, publicly filed on March 11, 2016.

Dated: April 23, 2021
New York, New York


Sheila C. Ramesh